

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED

AUG 20 2024

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

TONIE NENO MITCHELL,

Defendant.

) INDICTMENT

)  
)  
) **1 : 24 CR 00300**

) CASE NO. \_\_\_\_\_

) Title 21, United States Code,  
) Sections 841(a)(1), (b)(1)(C) and  
) 846; Title 18, United States  
) Code, Section 2  
**JUDGE PEARSON**

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance,  
21 U.S.C. § 846)

The Grand Jury charges:

1. From on or about April 1, 2024, to on or about July 29, 2024, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant TONIE NENO MITCHELL and others known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession with Intent to Distribute a Controlled Substance,  
21 U.S.C. § 841(a)(1), (b)(1)(C))

The Grand Jury further charges:

2. On or about July 29, 2024, in the Northern District of Ohio, Eastern Division, Defendant TONIE NENO MITCHELL did knowingly possess with intent to distribute a mixture and substance containing a detectable amount of methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

FORFEITURE

The Grand Jury further charges:

3. The allegations contained in Counts 1 and 2 are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853. As a result of the foregoing offenses, Defendant TONIE NENO MITCHELL shall forfeit to the United States, any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of the offenses charged herein; and any and all of his property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the offenses charged herein; including, but not limited to, the following:

- A. \$350,795.00 in U.S. Currency seized on April 3, 2024;
- B. \$50,092.00 in U.S. Currency seized on July 29, 2024; and
- C. Ruger P94 9mm Pistol, Serial Number 315-23087, with 9mm Magazine and ammunition, seized on July 29, 2024.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.